

## **CSBG Monitoring Policies**

CSP monitors all eligible entities for compliance with performance goals, administrative standards, financial management requirements, federal statutes, and state requirements.

At a minimum, CSP conducts:

1. a full on-site review of each eligible entity at least once during a three (3) year period;
2. a full on-site review of each newly designated eligible entity immediately after the completion of the first year in which such entity receives funds through CSP;
3. a desk review of each eligible entity, who is not being monitored on-site during the current FFY, at least once annually;
4. follow-up reviews, including prompt return visits to eligible entities and their subcontractors, that fail to meet the goals, standards, and requirements established by the CSBG Act and the State Plan (to be conducted as necessary);
5. other reviews as appropriate, including reviews of eligible entities and their subcontractors that have had other federal, state or local grants terminated for cause (to be conducted as necessary); and
6. specify the date of the last audit conducted and the period covered by the audit for each eligible entity.

Further, even if an entity's grant has not been terminated, but if it appears that there is significant management, programmatic, or financial problems, CSP may perform a "special" review, as appropriate.

Monitoring activities include (but are not limited to) the following:

1. verification of grantee contract compliance;
2. observation of grantee service provision and types of assistance provided;
3. provision of training and technical assistance in direct services and administrative areas by the eligible entity for its staff persons and for its subcontractors;

4. attendance at regularly-scheduled governing board meetings, to observe board functioning and operation to verify consistency with the provisions of proper Tripartite Board practices and procedures;
5. review of governing board files to verify board composition and to review minutes for verification of proper board practices;
6. review of client and related program files to ensure appropriate paper trails, with emphasis on case management;
7. one-on-one contact with eligible entities and subcontractors (to the extent practicable) staff persons for the purpose of soliciting input with regard to program performance and other areas;
8. one-on-one contact with current program clients and/or ex-clients (to the extent practicable) for the purpose of soliciting input as to opinions about program effectiveness, and related areas;
9. confirmation of each eligible entity's (and subcontractor's) last audit, and the period covered;
10. conversations with staff members of eligible entities and subcontractors for the purpose of ascertaining what kinds of training and technical assistance is needed;
11. on-going (meaning daily) contact with eligible entities and subcontractors by telephone, in writing, or at information-sharing meetings;
12. collection of data and information from eligible entities and subcontractors (i.e., monthly performance and fiscal reports) in addition to other information either requested or voluntarily submitted to CSP; and
13. review of annual grant applications to assure compliance with federal and state assurances, and all applicable requirements of the CSBG Act.

CSP will comply with the federal requirements regarding monitoring; however, CSP may perform on-site reviews on a more frequent basis if individual program circumstances warrant "special" reviews.

A monitoring report will be provided to the eligible entity within sixty (60) days after the monitoring visit. CSP will inform the eligible entity of any deficiencies to be corrected, require the eligible entity to correct each deficiency; and offer training and technical assistance to help correct the deficiency. HHS/OCS will be notified of any deficiencies, the corrective

actions, and the outcome.

CSP may, at its discretion, taking into account the seriousness of the deficiency and the time reasonably required to correct it, allow the entity or entities to develop and implement, within sixty (60) days of being informed of the deficiency, a plan to correct the deficiency within a reasonable period of time.

CSP will, not later than thirty (30) days after receiving from an eligible entity a proposed quality improvement plan (corrective action plan), either approve such proposed plan or specify the reasons why the proposed plan cannot be approved.

If the entity does not correct the deficiency, CSP will, after providing adequate notice and an opportunity for a hearing, initiate proceedings to terminate the designation of, or reduce the funding, as appropriate.

Before terminating or reducing the funding, CSP must determine that "cause" exists and, if the entity so requests, submit the decision to HHS/OCS for review. HHS/OCS must complete the review within ninety (90) days of receiving necessary materials from the State; otherwise the State's determination becomes final. For purposes of both funding reductions and termination, "cause" exists where an entity has not complied with a State requirement or the terms of a contract or the State Plan. Official definition of "cause" follows.

For purposes of making a determination in accordance with the CSBG Act with respect to:

- (1) a funding reduction, the term "cause" includes--
  - (A) a state-wide redistribution of funds provided through the CSBG to respond to-
    - (i) the results of the most recently available census or other appropriate data;
    - (ii) the designation of a new eligible entity; or
    - (iii) severe economic dislocation; or
  - (B) the failure of an eligible entity to comply with the



terms of an agreement or the State Plan, or to meet a state requirement, as described in section 678C(a) of the CSBG Act; and

- (2) a termination, the term "cause" includes the failure of an eligible entity to comply with the terms of an agreement or the State Plan, or to meet a State requirement, as also described in section 678C(a) of the CSBG Act.

If CSP terminates or reduces funding without providing the required hearing or HHS/OCS review, HHS/OCS may directly fund the eligible entity until the violation is corrected if appropriate. If that happens, the next year's allocation to the State will be reduced by an amount equal to the funds provided to the eligible entity.

CSP ensures compliance with this assurance through consultation, advice, and direction from the State Assistant Attorney General who is designated as the liaison with the CSBG through the Office of the Attorneys General. In addition, CSP will utilize its CSBG "Appeal/Hearing Process" commensurate with the requirements of Section 678(c) of the CSBG Act.